

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

CITY OF EL CENIZO, *et al.*,
Plaintiffs,

v.

STATE OF TEXAS, *et al.*,
Defendants.

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CIVIL ACTION NO.
5:17-CV-404-OG
[Consolidated/Lead Case]

DEFENDANTS' MOTION TO STRIKE, TO DISMISS, OR FOR A MORE DEFINITE STATEMENT
EXHIBIT A

Thompson, William

From: Nina Perales <nperales@MALDEF.org>
Sent: Monday, December 2, 2019 1:23 PM
To: Thompson, William
Cc: Ramon Soto; garzpalm@aol.com; Martin Golando (martin.golando@gmail.com); Efren C. Olivares; mimi@texascivilrightsproject.org; megan.riley@austintexas.gov; sameer.birring@austintexas.gov; Biggs, Adam
Subject: RE: SB4 -- Conference on motions

Will,

Thank you very much for the quick response. I will be sure to include your position on today's motion and the motion to amend.

Nina Perales
Vice President of Litigation
Mexican American Legal Defense
and Educational Fund, Inc. (MALDEF)
110 Broadway, Suite 300
San Antonio, TX 78205
Ph (210) 224-5476 ext. 206
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From: Thompson, William [mailto:Will.Thompson@oag.texas.gov]
Sent: Monday, December 02, 2019 1:20 PM
To: Nina Perales
Cc: Ramon Soto; garzpalm@aol.com; Martin Golando (martin.golando@gmail.com); Efren C. Olivares; mimi@texascivilrightsproject.org; megan.riley@austintexas.gov; sameer.birring@austintexas.gov; Biggs, Adam
Subject: RE: SB4 -- Conference on motions

Nina,

I am sorry to hear about Ms. Garcia's loss. We do not oppose your motion for an extension of time.

We oppose your motion to amend your complaint insofar as you seek to add new claims, add new defendants, or change your existing claims. Insofar as you seek to drop existing claims or drop existing defendants, we are not opposed.

I am available to discuss these matters on the phone if you think that would be helpful.

Best,
Will

Will Thompson
Special Counsel for Civil Litigation
Office of the Attorney General
209 West 14th Street
Austin, Texas
(512) 936-2567

From: Nina Perales <nperales@MALDEF.org>
Sent: Monday, December 2, 2019 12:29 PM
To: Thompson, William <Will.Thompson@oag.texas.gov>; Biggs, Adam <Adam.Biggs@oag.texas.gov>
Cc: Ramon Soto <rsoto@MALDEF.org>; garzpalm@aol.com; Martin Golando (martin.golando@gmail.com) <martin.golando@gmail.com>; Efren C. Olivares <efren@texascivilrightsproject.org>; mimi@texascivilrightsproject.org; megan.riley@austintexas.gov; sameer.birring@austintexas.gov
Subject: SB4 -- Conference on motions

Dear counsel,

I write to confer on two motions that the San Antonio plaintiffs plan to file.

1. A motion to extend the deadline to amend pleadings from Wednesday December 4 to Friday December 13, 2019. San Antonio Plaintiffs' counsel Yolanda Garcia lost her mother and will not be in the office before the current filing deadline. This extension will move Texas's deadline to file a motion to dismiss from January 3 to January 13.
2. A motion for leave to amend the complaint. On the deadline to amend pleadings, the San Antonio plaintiffs plan to file a motion for leave to amend their complaint to add as-applied challenges to SB4 as well as add several new parties.

Please let me know whether your clients object to the motions. Thank you,

Nina Perales
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